

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

**NADOO1029297

MERRIMACK INDUSTRIES FINISHES

**PO BOX 129

HAVERHILL

INSTALLATION ADDRESS

**133 RAILROAD AVE

HAVERHILL

EPA Form 8700-12B (4-80)

09/26/80

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MEMO TO FILE NUMBER: MADOO1029297

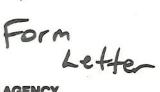
This company was involved in a project attempting to identify "potential non-notifiers" in Massachusetts. The background to this project is as follows:

After reviewing the company's response to our inquiry (see Attachment 2), it was recognized that the company had notified EPA of hazardous waste activity taking place at the company under the Resource Conservation and Recovery Act (RCRA). For one of various reasons (i.e. company changed name) this was not discovered at the initiation of the project. To conclude the company's involvement in the project, a letter was sent to the company acknowledging the company's previous notification under RCRA (see Attachment 3).

Any other project-related information (i.e. phone memos, information supplied by the state, etc.) is attached to the company's response (Attachment 2).

Christine O'Shaughnessy State Waste Programs Branch Attachment 1







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203 CERTIFIED MAIL - RETURN RECEIPT REQUESTED

George Olson

Worverine Corp.

30-050000

Request for information pursuant to §3007 of the Resource Conservation and Recovery Act, 42 U.S.C. §6927.

Dear Sir:

On October 21, 1976, Congress enacted the Federal Resource Conservation and Recovery Act (the "Act"), 42 U.S.C. §6901 et seq., which provided for the development and implementation of a comprehensive program to protect human health and the environment from improper management of hazardous waste. The Act requires any person generating or transporting a hazardous waste, or owning or operating a facility for the treatment, storage or disposal of a hazardous waste to notify the Environmental Protection Agency (EPA) of this activity. This notification includes the location and general description of the hazardous waste activity and the hazardous wastes handled.

Your organization has been identified by EPA (in conjunction with the Massachusetts Department of Environmental Quality Engineering) as one which may handle hazardous waste. In order to fully assess your facility's compliance with applicable state and federal requirements, certain information is necessary.

We hereby request that the information detailed on Attachment 1 be furnished to the EPA within twenty (20) days of receipt of this letter. Please be advised that this information request is being made pursuant to the authority of Section 3007 of the Act, 42 U.S.C. §6927.

Section 3007 of the Act provides that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous waste shall upon request of any officer, employee or representative of the Environmental Protection Agency... furnish information relating to such wastes..."

You will find the following documents enclosed for your assistance in supplying the requested information:

Federal Register Composite "Identification and Listing of Hazardous Waste", May 19, 1980 and November 12, 1980.

- SW-840 "Hazardous Wastes Information: Notification Requirements", June, 1980.
- 3. Federal and State Regulation of Hazardous Waste, DEQE, 9/84.

This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501 et seq. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR §2.202(b). Information covered by such a claim will be disclosed by EPA only to the extent and by the means of the procedures set forth in 40 CFR Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Please send the information requested above to:

Christine O'Shaughnessy
State Waste Programs Branch
U.S. Environmental Protection Agency
JFK Federal Building, Room 409
Boston, MA 02203

Failure to comply with the above request within twenty (20) days of receipt of this letter, or to adequately justify such failure to comply, may result in an enforcement action by EPA, including the assessment of penalties. Moreover, any person who knowingly makes a false statement or representation in any record, report or other document filed pursuant to Subtitle C of the Act shall be liable for a fine of up to \$25,000 for each day of violation or imprisonment for up to one year upon conviction in federal court.

If you have any questions with regard to the above, please contact Christine O'Shaughnessy at (617) 223-1926.

Sincerely,

Merrill S. Hohman, Director Waste Management Division

Enclosures

Attachment 1

Please review the enclosed information to determine if your operation generates or handles hazardous waste. If you handle hazardous waste but have already filed a Notification of Hazardous Waste Activity (EPA Form 8700-12), please report the date of this notification and the I.D. Number issued if applicable. Otherwise, provide the following information:

- Briefly describe your current operations and any changes made in the operation since November 19, 1980.
- 2. List all hazardous wastes you handle or have handled since November 19, 1980 that are identified in the enclosed regulations or in 310 CMR \$\$30.120 - 30.133. Include information as to the process and manner in which those wastes are generated or other information concerning their origin. Also include information as to the chemical composition, characteristics ~ (i.e. ignitability, corrosivity, reactivity and toxicity) and hazardous constituents contained in each waste.
- For each hazardous waste identified in item 2, list (in kilograms) quantities handled per month for each month since November of 1980 and the total amount of each waste currently on-site.
- Describe any past or present on-site storage, treatment or disposal practices for the hazardous wastes identified in item 2 above, including the dates and quantities of wastes involved.
- 5. Briefly describe any wastewater treatment system in use at your operation which may involve hazardous wastes. Include your NPDES permit number or the name of the municipal sewer system into which you discharge if applicable.
- 6. If you do not treat or dispose of an identified hazardous waste on-site, report the names and addresses of any transporter and off-site treatment, storage or disposal facilities that handle the waste, the dates of such handling and the quantities of waste involved.
- State the month and year when hazardous waste activities commenced at your site (even if they were originated by a previous owner).
- 8. Detail any past contact (provide copies of correspondence if applicable) with State or Federal agencies regarding hazardous waste activity at your site.

Please submit copies of records (specifically manifests and/or bills for lading for hazardous waste shipments) described in, or which contain information described in paragraphs (1) through (8) above.

INA

Attachment 2

DEC 1 2 1984



EXECUTIVE OFFICES and FACTORY
33 Railroad Avenue
P.O. Box 129
HAVERHILL, MASSACHUSETTS 01831
617-374-4758

December 6, 1984

J.K.

United States Environmental Protection Agency Region I J.F. Kennedy Federal Bldg. Boston, MA 02203

Gentlemen:

The only hazardous waste we generate is the ignitable sludge material that is not regenerated when our wash solvents are drained off for distillation about three times a year. At these times, we develope 6 to 7 drums of sludge that we have to dispose of using a licensed handler and incinerator of the material.

Back in 1980 we applied for an E.P.A. ID number on form 3510-1 and also completed form 8700-12, copies of which are enclosed.

From the wording in paragraph one of attachment one of your November 29, 1984 "Request for information Pursuant to 3007 of the RCRA 42 USC #6927" it appears we are satisfying your requirements. If you require repeated answers to items 1 through 8 please notify us.

Sincerely,

Richard H. Illandy

Richard H. Moody

President

Enclosures

Hachment 3

March 22, 1985

Mr. Richard Moody Merrimack Industrial Finishes 33 Railroad Avenue/P.O. Box 129 Haverhill, MA 01831

Dear Sir:

This letter is to acknowledge receipt of your letter dated December 6, 1984 replying to our request for information on hazardous waste activities conducted by your organization. Your response indicates that you have already notified as a handler of hazardous waste under the Resource Conservation and Recovery Act.

Thank you for your cooperation and timely response. Sincerely,

Ira W. Leighton, Chief MA/VT Waste Programs Section

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Moody Merrimack Industrial Finishes 33 Railroad Avenue Haverhill, MA 01830 6/21/82

RE: EPA I.D. Number MAD001029297

Dear Mr. Moody:

EPA has completed its intitial review of your permit application to treat/store/dispose of hazardous waste under the Resource, Conservation and Recovery Act ("RCRA"). From the information provided in your application, and a meeting held on 4/12/82, between Merrimack Ind. Finishes and EPA, it appears that the facility does not require a RCRA permit under Section 3005 of the Act, in accordance with 40 CFR Part 122.21(d)(2)(i). Under this section, a generator is allowed to accumulate hazardous waste on-site for up to 90 days, in accordance with 40 CFR Part 262.34, without a RCRA permit.

EPA is returning your application since the information contained therein does not demonstrate that the facility is required to obtain a permit under Section 3005 of RCRA. If EPA's interpretation of the application is incorrect or if the application itself is incorrect and the facility is in fact one which is required to have a permit under Section 3005 of the Act, a complete RCRA Part A Application (EPA Forms 3510-1 and 3510-3) must be completed and resubmitted to this office by If hazardous waste is handled at the facility referenced above and the applicant fails or refuses to submit a complete Part A application within this period appropriate enforcement action may be taken.

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If you have any questions, or need any assistance, please contact the appropriate EPA State Waste Programs Branch personnel listed below at (617)223-0240.

All replies should be addressed to:

U. S. Environmental Protection Agency State Waste Programs Branch Room 2109 JFK Federal Building Boston, Massachusetts 02203 Attn: Richard Cavagnero

Sincerely yours,

Richard C. Boynton, Chief Permits Section

Maine New Hampshire Massachusetts Rhode Island Vermont Connecticut William Sarro Christine King Ed Woo & Dek Lee Frank Battaglia Mike O'Brien Cindy Gilder

cc:

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A. STREET, ROUTE NO. OR OTHER S	SPECIFIC IDENTIF	1 1 1 1 1 1 1 4 4 5			Y
B. COUNTY NAME	11111	T AT STATE OF THE			
C. CITY OR TOWN	, , , , , ,	D.STATE E. ZIP CO	F. COUNTY CODE (if known)		
6 HHV EKH L C 15 16 EPA Form 3510-1 (6-80)		40 41 42 47	51 52 - 54 CONT	INUE OF	N REVERSE

CONTINUED FROM THE FRONT	VIII. DAYS AND HIM THE PARTY OF
VII. SIC CODES (4-digit, in order of priority)	
A. FIRST	B. SECOND
7 S () (specify)	c (specify)
15 16 - 19	15 16 - 19
C. THIRD	D. FOURTH
(specify)	(specify)
15 16 - 19	15 10 10 10 19
VIII. OPERATOR INFORMATION	B. Is the name listed in
	Item VIII-A also the owner?
8 MERRIMACK INDUSTRIAL F	MISHES DYES DNO
15 16	55 66
C. STATUS OF OPERATOR (Enter the appropriate letter into the answ	er box; if "Other", specify.) D. PHONE (area code & no.)
	specify) a 6/7 374 4758
S = STATE O = OTHER (specify) P = PRIVATE	15 16 - 10 19 - 21 22 - 25
E. STREET OR P.O. BOX	
33 RHILROAD AVE	
26	55
F. CITY OR TOWN	G.STATE H. ZIP CODE IX, INDIAN LAND
BHAVERHILL	MA 01830 Is the facility located on Indian lands?
BHAVERHILL	52
15 16	40 41 42 47 - 51
X. EXISTING ENVIRONMENTAL PERMITS	e from Proposed Courses
A. NPDES (Discharges to Surface Water) D. PSD (Air Emission	s from Proposed Sources)
9 N 9 P	<u>, , , , , , , , , , , , , , , , , , , </u>
15 16 17 18 - 30 15 16 17 18 B. UIC (Underground Injection of Fluids) E. OTHE	R (specify)
CT 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	(specify)
9 U 9 9 1 18 30 15 16 17 18	30
	ER (specify)
CTI IIIIIIII CTI IIII	(specify)
9 R 9 15 16 17 18 30 15 16 17 18	- 30
XI. MAP	
Attach to this application a topographic map of the area extending	to at least one mile beyond property bounderies. The map must show
the outline of the facility, the location of each of its existing and	proposed intake and discharge structures, each of its hazardous waste
water bodies in the map area. See instructions for precise requirement	ects fluids underground. Include all springs, rivers and other surface
XII. NATURE OF BUSINESS (provide a brief description)	
my 1 t Raint 4	course & Stains by contin
Manufactures - Point, Lo wood and metal Prod	equity, promotion for conting
was and anotal Prac	and the state of t
, wood and meny ynoo	anes,
92.37 0.54 5 7	
	10 y 129
	The state of the s
XIII. CERTIFICATION (see instructions)	
	am familiar with the information submitted in this application and all
	mediately responsible for obtaining the information contained in the
false information, including the possibility of fine and imprisonment	mplete. I am aware that there are significant penalties for submitting
A NAME & OFFICIAL TITLE (tupe or print)	TURE C. DATE SIGNED
8.0 011 nm 0	chard H. Moody 10/10/80
Richard & Moody Re	chard 1. 111000cy 10/10/80
COMMENTS FOR OFFICIAL USE ONLY	
C	11111111111
PA Form 3510-1 (6-80) REVERSE	22

R. JRT OF A PHONE CALL VISIT

	t TT6
Date 5/27/8/ Time .	Routing
Person Contacted Richard Moody	
Phone No. (617) 374-4758	
Location Merrimack Industrial Finishe	es Haverhill MA.
Subject 7 am 1 of Part A missing	
summary They do not store or	J.
presently. After they have	
Torrey, they filed the	strage permit (part A
to protect themselves in	case they can not
get a pick up scheduled	on time.
	, they were suppose to
correct the form 1 and sen	
	ran still apply later of
they want storage over go days	and they do not presently
meed a permit - but compan	y still want to go
through with it.	0
Action Required Waiting for corrected	form 1 *
Eligible for interior s	status - they are not
really late filers of	ince they are not storing
over go days now.	
The Control of the Co	
EPA Graphics 5/27/80 Signature	Sek Lee

Rich



EXECUTIVE OFFICES and FACTORY
33 Railroad Avenue
HAVERHILL, MASSACHUSETTS 01830
617-374-4758

December 4, 1980

EPA Region I Permits Branch P.O. Box 8748 Boston, MA 02114

Gentlemen:

Merrimack Industrial Finishes would like to apply for an interim storage permit on a voluntary basis. We ask this because it is our judgment that circumstances beyond our controls force us into becoming a storage facility (over 90 days). There is only one company, Solvents Recovery Services, in New England that can recycle our wash solvents. If for any reason they cannot service us as they always have in the past, we would be in violation of the E.P.A. laws.

We have been in existence since 1948. We filed and received E.P.A. #MAD 001029297. We filled out the Form I General and were advised by Don Mackie that we did not need to submit it. Having talked to Mr. Bill Torrey, it seems wiser to be safe. So here is our application.

Sincerely,

Richard H. Moody

President

Merrimack Industrial Finishes Div. of Coulter Fibres, Inc.

Richard H Mody

RHM/bt enc.

Lary,

This facility was a late Permit
filer and the was missing form 3.
We sent a lotter requesting the form 3
and to amend the form I to indicate yes as
a hazardow waste storer. He returned the
prissing form 3 but the original form I
as still missing. Could you please call
and find out why they were a late filer
and they did not resubmit their form I.

Rich

C 1 2		DUP 13 14 15	11	111	7	11,		11,	1//
E.	A. PRO-	B. PROCESS DESIGN CAPACIT		505	0:	A. PRO-	B. PROCESS DESIGN CAPAC	ITY	FOR
LINE	A. PRO- CESS CODE (from list above)	1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)	OFFICIAL USE ONLY	LINE	A. PRO- CESS CODE (from list above)	I. AMOUNT	2. UNIT OF MEA- SURE (enter code)	OFFICIAL USE ONLY
110	16 - 10	19 - 27		29 - 32		16 - 18		- 29	20 - 32
X-1	502	600	G		5		NONE		
X-2	T 0 3	20	E		6				
1	561	200	1		7				70 DE 10 10 10 10 10 10 10 10 10 10 10 10 10
2					8				
3					9				
4	16 - 18	19 • 27	28	29 - 32	10	16 - 18	19 - 27	2.5	29 - 32

wish to do is sitere our own vecycleak Solvents letwern Tomber pick ups in 55 job Drums Ballile outdoors an our own property. We will also a few drums (10-12) of the kludge that is not pick up in kulk for vecycling. The shidge we will how Eispose of according TO E.P.A. Requirements,

V. DESCRIPTION OF HAZARDOUS WASTES

- EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- 3. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed wastels) that will be handled which possess that characteristic or contaminant.
- . UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMS
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

). PROCESSES

- 1. PROCESS CODES:
 - For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
 - For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
 - Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

OTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by nore than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
- quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 00 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA			C. UNIT		D. PROCESSES									
NO.	HAZARI WASTEN (enter cod	0	B. ESTIMATED ANNUAL QUANTITY OF WASTE	SURE (enter code)		1. PROCESS CODES (enter)									2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5	4	900	P	1	0	3	D	8	0					
X-2	D 0 0	2	400	P	1	10) 3	E	8	0				1	
X-3	D 0 0	1	100	P	1	70	13	E	8	0					
X-4	D 0 0	2			1		1		1	T	T	1			included with above

4 P C	PTIO PA RD.	BER (enter from page 1) 1 D 2 9 2 9 7 1 1 1 N OF HAZARDOUS WAST B. ESTIMATED ANNUAL QUANTITY OF WASTE	00	- UN	tin	wed)	F CARCAGO	DUP	IAL USE	17/A C DUP
A. EP	PTIO PA RD. NO ode)	N OF HAZARDOUS WAST	00	- UN	tin			DUP		
A. EP	RD. NO ode)	B. ESTIMATED ANNUAL	00	- UN	350 (2)	wed)			SECRETARIA SECURIOR DE LA CONTRACTOR DE	
ASTE enter c	NO ode)	R. ESTIMATED ANNUAL QUANTITY OF WASTE		FME	PORTS (行演问题的特征			D	p. PROCESSES
				sunt (ente code,	A-		(8)	ess code:		2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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Continued from the front.	A CONTRACTOR OF THE PARTY OF TH	and the second s	TO SEE SEE SEE SEE		第4年数 3年
T. DESCRIPTION I PROCE	cess codes F	ROM ITEM D(I) ON PA	. € 3.	, ,	
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Ber FPA and	State	Lequirem	with ,		
0 = 1 // // 2/2		1			
EPA I.D. NO. (enter from page 1)					
FM+1001029292906		T-27-1			
V. FACILITY DRAWING All existing facilities must include in the space provided on	page 5 a scale dra	wing of the facility (see inst	ructions for more	detail).	
VI. PHOTOGRAPHS All existing facilities must include photographs (aero	ial or ground—le	evel) that clearly delinear	te all existing st	ructures; existing storage	
treatment and disposal areas; and sites of future stor	Statistics.			AND THE WATER AND THE	AL IN
LATITUDE (degrees, minutes, & seconds	9)	LON	4 2 6 6	s, minutes, & seconds) 1 7 3 8 " 5 76 77 - 79	
VIII. FACILITY OWNER					
A. If the facility owner is also the facility operator as skip to Section IX below.					ft and
B. If the facility owner is not the facility operator as	listed in Section V	/III on Form 1, complete th	e following items	2. PHONE NO. (area c	ade & na l
1. NAME OF FACE E	LITY'S LEGAL C	DWNER		2. PHONE NO. (area o	otte de no.)
15 16		4. CITY OR TOWN		55 56 - 51 59 - 61 5. ST. 6. ZIP COI	62 - 6: DE
3. STREET OR P.O. BOX	G G				
15] 16	45 15 15		MARKE MAN	4 4 4	NAME AND ADDRESS OF
IX. OWNER CERTIFICATION I certify under penalty of law that I have personally	v examined and	am familiar with the info	ormation submi	itted in this and all attach	ed
documents, and that based on my inquiry of those is submitted information is true, accurate, and completincluding the possibility of fine and imprisonment.	induviduals imm	ediately responsible for	opeammy ure ir	HOLLING TONLY I DOUGLA PLAN	ALC: NO STATE OF THE PARTY OF T
A. NAME (print or type)	B. SIGNATUR	1 1/ 1/ /	7	C. DATE SIGNED	
RICHARD H MOEDY	Nicha	of H. Mrode	1	5/1/81	
X, OPERATOR CERTIFICATION			armetics sub-	itted in this and all attack	hed
I certify under penalty of law that I have personally documents, and that based on my inquiry of those submitted information is true, accurate, and comple including the possibility of fine and imprisonment.	individuals imm ete. I am aware	ectatety responsible for	ublanning the n	Hulliacion, i bonoso cita	2110
A. NAME (print or type)	B. SIGNATUR	RE MAL MAS	0	C. DATE SIGNED	
RICHARD A MOODY	Richa	rd W. Mler	dy	3/1/81	CALDAGE
				CONTINUE	- CHU MAIS

EPA Form 3510-3 (6-80)

PAGE 4 OF 5

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3 276 H 0 :2-0 1 UNDEVELOP LAND RAILECAL RRIMACK Rosron W S 76

PAGE 5 OF 5

V. FACILITY DRAWING (see page 4)



DIVISION COULTER FIBRES INC.

EXECUTIVE OFFICES and FACTORY
33 Railroad Avenue
HAVERHILL, MASSACHUSETTS 01830
617-374-4758

November 18, 1980

U.S. Environmental Protection Agency Region 1 J.F. Kennedy Federal Bldg Boston, MA 02203

ATTENTION: Mr. Richard C. Boynton, Chief Permit Developement Section EPA#MAD001029297

Dear Mr. Boynton,

I am writing this in response to your "Dear Notifier" letter, and a fter talking with your Don Maki by phone.

Merrimack Industrial Finishes is a small quantity generator. We will develop six to seven drums of waste paint sludge over a three month period. That is all outside of paper, cartons, strapping, etc.

It is my understanding that we must properly dispose of this sludge material within 90 days of when it is generated. We usually have been able to do this within a couple of weeks.

I have made out the Form 1 general, but the instructions indicate that these forms need not be submitted since each question is answered "No". Mr. Maki advised not sending this in.

Hopefully, we are proceeding properly. Our waste will be labeled and disposed of through a liscenced hauler and disposer.

Sincerely,

MERRIMACK INDUSTRIAL FINISHES Div. of Coulter Fibres, Inc.

Richard H. Moody President

RHM/t1m Landi Ger Small

EPA Form 8700-12 (6-80)

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

0.00

IX. DESCRIPTION OF	HAZARDOUS WAST	ES (continued from	(ront)	1113		
A. HAZARDOUS WASTES waste from non—specific	FROM NON—SPECIFIC sources your installation	C SOURCES. Enter the n handles. Use addition	four-digit number from al sheets if necessary.	1 40 CFR Part 261,31 fd	or each listed hazardou	15
1 1	2	3	4	5	6	Garage 1
23 - 26	23 - 26	23 - 26	23 - 21	23 " 26	23 - 26	2.差许日
7	8	9	10	11	12	
23 - 26	23 - 25	23 2 26	23 2 26	22 22	23 25	
3. HAZARDOUS WASTES specific industrial sources	FROM SPECIFIC SOUP	RCES. Enter the four—ces. Use additional sheet	digit number from 40 CF	R Part 261.32 for each	listed hazardous waste	e from
13	14	15	16	17 / /	18	rigns
1078						
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
19	20	21	22	23	24	
23 - 26	23 - 26	23 - 26	23 26	23 - 26	23 - 26	
10:250 a	26	27	28	29	30	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
stance your installation h	andles which may be a l	nazardous waste. Use ad	ditional sheets if necessary	35	36	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
37	38	39	40	41	42	
	100	300				
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
43	44	45	46	47	48	
	23 - 26	23 7 26	23 - 26	23 - 26	23 25	
D. LISTED INFECTIOUS W	ASTES. Enter the four	-digit number from 40	CFR Part 261.34 for ea	ch listed hazardous wast		rinary
49	50	51	52	53	54	
				23 - 26		
E. CHARACTERISTICS OF hazardous wastes your in:					eristics of non-listed	13-92
1. IGNITAE		2. CORROSIVE	[]3. REAC	STIVE	4. TOXIC	
CERTIFICATION						DEPT.
I certify under penalty attached documents, as I believe that the subm mitting false information	nd that based on my itted information is	inquiry of those inc true, accurate, and c	lividuals immediately complete. I am aware	responsible for obta	aining the informat	tion,
IGNATURE		NAME & OF	FICIAL TITLE (type or	print)	DATE SIGNED	
0,0011			10 4		01110	
	1 WELL A MANUEL	1 /1-	77		1 × / // / × /	

REPORT OF PHONE CALL VISIT

in	Out	File
	1/2/82 Time 10-300,m	Routing
Person	Contacted Richard Moody	Phone No.
Loc	eation Merrimack Industrial Finishes	Inc.
	Returning Part A	
Summa	ry They sent in the Part A	as a protective
Junina	filing - just in case they c	an not get a
	transporter to take their waste	away within
	go days. From the meeting he	ld on April 12,1982,
	Richard Moody was told about	Nov. 19 1982 FR
-	that will give him interior st	
-	send in the Part A inthin	30 days.
	Therefore he can be only a	
	Stores for less than 90 a	days.
	Pic. 10,1982 FR gives him 30 a	any to get part Am.
-	Jan. 11, 1982 FR gives him 30 d.	mys xumsur over the reality
	in overgencies.	
Acti	on Required Return his part A.	- only a generator
		X ela Lac
☆ C	PO 961-000	Signature



DIVISION COULTER FIBRES INC.

EXECUTIVE OFFICES and FACTORY
33 Railroad Avenue
HAVERHILL, MASSACHUSETTS 01830
617-374-4758

November 18, 1980

U.S. Environmental Protection Agency Region 1 J.F. Kennedy Federal Bldg Boston, MA 02203

ATTENTION: Mr. Richard C. Boynton, Chief Permit Developement Section EPA#MAD001029297

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Sincerely,

MERRIMACK INDUSTRIAL FINISHES Div. of Coulter Fibres, Inc.

Richard H. Moody

President

DHM/+1m

I. SIC CODES (4-digit, in order of priority) A. FIRST	and the second seconds. The second se	B. SECOND
(specify)	specify (specify	
8,0,10	15 16 + 19	D. FOURTH
C. THIRD	s (specify	D, POOR I H
(specify)	7	
10 - 10	15 11 12 - 2001)	
II. OPERATOR INFORMATION		B. Is the name listed
	A. NAME	item Vill-A also owner?
MERRIMACK INDUST	RIAL FINISHES	LYES □ N
10 温度设置的 18 19 19 19 19 19 19 19 19 19 19 19 19 19		D. PHQNE (area code & no.)
C. STATUS OF OPERATOR (Enter the appropriate lett	ter into the answer box; if "Other", specify.	el li
F = FEDERAL M = PUBLIC (other than federal or st S = STATE O = OTHER (specify) P = PRIVATE	rate) P (specify)	A 6/7 37 9 17 5 8
E. STREET OR P.O. BOX		
3 RAILROAD AVE		and the state of t
S KALL KUILD, JAKE		CODE IX, INDIAN LAND
F. CITY OR TOWN	G.STATE H, ZIF	IX. INDIAN LAND
HAVERHILL	MA 018	30 □YES XNO
10年的一次在17月1日 中国中国国际中国的国际公司 医二甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基	17 mm 1 42 1 42 1 42 1 42 1 42 1	- 22. W
EXISTING ENVIRONMENTAL PERMITS	The form Proposed Sources	A PRINCIPLE OF THE PRIN
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OD	1	
N 30 16 17		
B. UIC (Underground Injection of Fluids)	E. OTHER (specify)	(specify)
	1	
U 20 15 16 17		7
C. RCRA (Hazardous Wastes)	E. OTHER (specify)	(specify)
R 9	T	Combination are the first comment
30 110 16 16 1	7 10	
(I, MAP		and property boundaries. The man must show
Attach to this application a topographic map of the a	s existing and proposed intake and dis	scharge structures, each of its hazardous waste i. Include all springs, rivers and other surface
or disposal facilities, and each we	cise requirements.	The second secon
water bodies in the map area. See instructions for prec	ase requirements.	THE REAL PROPERTY OF THE PROPE
water bodies in the map area. See instructions for prec	ase requirements.	
water bodies in the map area. See instructions for prec	ase requirements.	
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water bodies in the map area. See instructions for precision. NATURE OF BUSINESS (provide a brief description) Pair Cooling Wood AUL OF PIECATION (see instructions)	and miletal.	and Stains for
treatment, storage, or disposal facilities, and each we water bodies in the map area. See instructions for precision. KII. NATURE OF BUSINESS (provide a brief description) Pair Cooling Wood XIII. CERTIFICATION (see instructions)	and metal.	and Stains for
xIII. CERTIFICATION (see instructions) / certify under penalty of law that I have personally attachments and that, based on my inquiry of the water hoodies in the map area. See instructions for precision water bodies in the map area. See instructions for precision is true.	examined and am familiar with the incorporate and complete. I am aware the dimprisonment.	one Stains for formation submitted in this application and a for obtaining the information contained in that there are significant penalties for submittle
XIII. CERTIFICATION (see instructions) // certify under penalty of law that I have personally attachments and that, based on my inquiry of the application, I believe that the information is true, a false information, including the possibility of fine an	examined and am familiar with the incorporate and complete. I am aware the dimprisonment.	one Stains for a submitted in this application and a for obtaining the information contained in the at there are significant penalties for submittle
xIII. CERTIFICATION (see instructions) / certify under penalty of law that I have personally attachments and that, based on my inquiry of the water hoodies in the map area. See instructions for precision water bodies in the map area. See instructions for precision is true.	examined and am familiar with the incorporate and complete. I am aware the dimprisonment.	on Stains for submitted in this application and a for obtaining the information contained in the at there are significant penalties for submitted

COMMENTS FOR OFFICIAL USE ONLY

MAD 1001029297

INTERNAL CHECKLIST

1.	Interim	Regulatory	Requirements
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	Α.	(1) FORM 1 MISSING	1_1	
		(2) FORM 3 MISSING	TOR	
	В.	POSTMARK after NOVEMBER 19, 1980	Valid	[
	С.	(1) DATE of OPERATION MISSING	<u> _ </u>	
		(2) DATE OF OPERATION after NOVEMBER 19, 198 NOTIFIED after AUGUST 18, 1980	0 <u> </u> <u> </u> Valid	ı
	E.	(1) FORM 1, XIII B SIGNATURE MESSING		
		(2) FORM 3, IX B SIGNATURE MESSICY	11	
2.	A.	HANDLER	1	
	В.	NONREGULATED	I TO	
	С.	UNSURE	1_1	
	D.	UNKNOWN FACILITY (missing name and address on Form 3)	1_1	
	E.	NEW FACILITY	1_1	
	F.	CORE ITEM(S) MISSING	1_1	
	G.	NON-CORE ITEM(S) MISSING	1_1	
	н.	OTHER	1_1	

FORM 1 (EPA FORM 3510-

ITEM N	UMBER	100			
II.	Poll	tant Characteristics			11
FIII.	Name	of Facility			
IV.	Faci	lity Contact			[] I
v	Faci	lity Mailing Address			
	Α.	Street or P.O., Box	2 1 1		<u> </u>
	В.	City or Town			<u> </u>
	c.	State			
	D.	Zip Code			<u> </u>
VI.	Faci	lity Location			
	*A.	Street, Route Number			1_1
	В.	County Name			1_1
	*С.	City or Town	• •		<u> _ </u>
	*D.	State			<u> </u>
	E.	Zip Code			<u> </u>
27	F.	County Code (if know	n)		
VII.	SIC	Codes (other than Pro	cess and	Hazardous Was	te) _
VIII.	Opei	ator Information			
	*A.	Name			1_1_1
	*B.	Is the name listed i	in VIII-A	also the own	er _
	c.	Status of operator			1_1
	D.	Phone			
28	έE.	Street or P.O. Box			
	*F.	City or Town			LI.
	*G.	State Zip Code		考 证	

IX.	Indian Land
X.	Existing Environmental Permits
XI.	Map I型I
XII.	Nature of Business
XIII.	Certification
8	A. *1. Name and
	2. Official Title
	*B. Signature
	*C. Date Signed . I_I
Commen	ts:
Form 1	is missing

Items preceded by * must be submitted by

FORM 3 (EPA FORM 3510-3)

ITEM NUMBER

*II.	A First Application	
	 Existing Facility Date (on or before November 19, 1980) 	_
	2. New Facility Date (after November 19, 1980)	1_1
*III.	Processes	
	A. Process Code	1_1
	B. Process Design Capacity-Amount	
	1. Amount	1_1
	2. Unit of Measure	1_1
*IV.	Description of Hazardous Wastes	
	A. EPA Hazardous Waste Number	1_1
	B. Estimated Annual Quantity	1_1
	C. Unit of Measure	1_1
	D. Processes	
	1. Process Codes	1_1
	2. Process Description	1_1
V.	Facility Drawing	1_1
VI.	Photographs	1_1
VII.	Facility Geographic Location	1_1
VIII.	Facility Owner	
	*1. Name of Facility's Legal Owner	1_1
	2. Phone	1_1
	*3. Street or P.O. Box	1_1
	*4. City or Town	1_1
	*5. State	
	6. Zip Code	1-1

"IX.	Owne	r Certification		
	Α.	Name	L.	
	В.	Signature	r i	_1
	С.	Date Signed	I I	_1
*X.	Oper	ator Certification		
	Α.	Name		_1
	В.	Signature		_1
	c.	Date	l l	_1
Commer	nts:			
Form 3	3 is m	issing		_1
Thoma		dod by \$ must be submitted t		

CONTINUE ON REVERSE

EPA Form 8700-12 (6-80)

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY INSTRUCTIONS: If you received a preprinted
INSTALLA- TION'S EPA MADOC 10 89397 Isbel, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information
I.D. NO In the appropriate section below. If the lebel is complete and correct, leave Items I, II, and III
1. STALLATION PO Box 129 below blank. If you did not receive a preprinted label possible of literature "Installation" means a
INSTALLA- Haves L'IP 1/4 01830 single site where hazardous waste is generated,
ADDRESS PLACE LABEL IN THIS SPACE porter's principal place of business. Please refer
to the INSTRUCTIONS FOR FILING NOTIFI-
LOCATION III OF INSTAL- LATION LOCATION MA C1830 CATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).
LATION Hoverbill MA C1830 Recovery Act.
FOR OFFICIAL USE ONLY
COMMENTS
INSTALLATION'S EPA I.D. NUMBER APPROVED DATE RECEIVED (yr., mo., & day)
F 1
I. NAME OF INSTALLATION
WERRIMACK INDUSTRIAL TINISHES
II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX
3 PC POX 127
CITY OR TOWN ST. ZIP CODE
4 14 AV E PH / L L A) A C / 8 5 C
III. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER
19 16
64111830
13 16 - 40 41 42 47 - 51
IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE NO. (area code & no.)
2 RICHARD MCCDY 617-324-4758
15 16 45 46 - 46 49 - 51 52 - 55 V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER
8 COULTER FIBRES INC
(enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
F = FEDERAL A. GENERATION B. TRANSPORTATION (complete item VII)
M = NON-FEDERAL Z C. TREAT/STORE/DISPOSE D. UNDERGROUND INJECTION
VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))
A. AIR B. RAIL C. HIGHWAY D. WATER E. OTHER (specify):
VIII. FIRST OR SUBSEQUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification.
If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.
C. INSTALLATION'S EPA I.D. NO.
A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C)
IX. DESCRIPTION OF HAZARDOUS WASTES Please go to the reverse of this form and provide the requested information.

			Г	I.D FOR OFF	ICIAL USE ONLY
	(*		1	W	13 14 1
				1 1	MANUSAMBARANA S
ESCRIPTION OF	HAZARDOUS WAST	ES (continued from f	ront)	0 CED Part 261 31 for	each listed hazardous
ZARDOUS WASTES	S FROM NON—SPECIFIC c sources your installation	SOURCES. Enter the fin handles. Use additional	four-digit number from 40 is sheets if necessary.		
1	- 2	3	4	5	
				23 2 26	20
25 - 86	23 - 26	23 - 26	10	11	12
7	8	 			
	43 26	23 - 26	23 - 26	23 - 26	23 - 26
ZARDOUS WASTE	S FROM SPECIFIC SOU	RCES. Enter the four-d	ligit number from 40 CFR	Part 261.32 for each li	sted hazardous waste from
ecific industrial source	es your installation handl	es. Use additional sheets		17	18
13	14	15	16.	HIT	
KC78			22 26	23 - 26	23 - 26
23 - 26	23 - 26	23 - 26	- 22	23	24
19					
23 26	23 26	23 - 26	23 - 26	29 - 26	23 - 26
25	26	27	28	29	HITT
		* 00203		11 11	23 - 26
23 - 26	23 - 26	23 - 26	r the four—digit number fr	om 40 CFR Part 261.3	3 for each chemical sub-
OMMERCIAL CHEN	NICAL PRODUCT HAZA To handles which may be a	hazardous waste. Use at	dditional sheets if necessar	γ.	THE POSSESSES AND A PERSON OF THE PERSON OF
31	32	33	34	35	36
1111	HIT				
23 - 26	22 - 26	23 - 26	23 - 26	23 - 26	42
37	38	39	40	41	HTT
				23 - 25	23 - 26
23 - 26	23 - 26	23 - 26	46	47	48
43		HTT			
	73 74	23 - 26	23 - 26	23 - 26	29 26
ISTED INFECTIOU	S WASTES. Enter the fo	ur-digit number from 40	O CFR Part 261.34 for each	h listed hazardous wast	e from hospitals, veterina
	research laboratories you	ur installation handles. U		53	54
ospitals, medical and		51	52	93	
ospitals, medical and	50				
49	£,		23 - 26 ork "X" in the boxes corres	23 - 26	23 - 26